February 26, 2010

Via ECFS
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36
Annual 64.2009(e) CPNI Certification for 2009
Date filed: February 26, 2010
Name of company covered by this certification: **CallTower, Inc** and affiliates
Form 499 Filer ID: **823246**
Name of signatory: **John Trimmer**
Title of signatory: **President/CEO**

Dear Ms. Dortch:

I, **John Trimmer**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with   47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

If any further information is required, please contact me at 415-869-8904 or by email at jtrimmer@calltower.com.

Sincerely,

John Trimmer
President/CEO
CallTower, Inc

CPNI Compliance Statement and Operating Procedures of **COMPANY**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)("EPIC CPNI Order"),[1] **John Trimmer, President/CEO, CallTower, Inc** and affiliated entities makes the following statement:

CallTower, Inc has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that **CallTower, Inc** is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize **CallTower, Inc's** policies and procedures designed to safeguard CPNI.

CallTower, Inc has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. **CallTower, Inc** is engaged in training their personnel as to when they are and are not authorized to use CPNI, and **CallTower, Inc** has an express disciplinary process in place.

CallTower, Inc uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. **CallTower, Inc** does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. **CallTower, Inc** has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

CallTower, Inc has established procedures to verify an incoming caller's identity. **CallTower, Inc** trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in **CallTower, Inc's** CPNI Manual. **CallTower, Inc** also limits the number of employees that have access to customer information and call data.

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[1] 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

CallTower, Inc has implemented measures to discover and to protect against unauthorized attempts to access CPNI. CallTower, Inc also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules. CallTower, Inc will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

CallTower, Inc has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Pretexters have not attempted to access CallTower, Inc's CPNI. There have been no customer complaints received in the past year concerning the unauthorized release of CPNI.

CallTower, Inc annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.
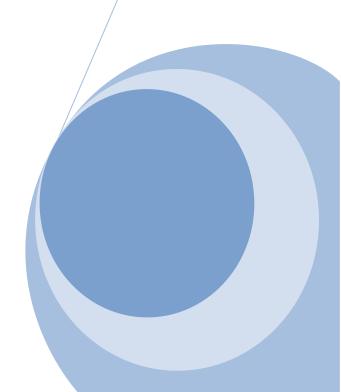
NAME

TITLE President

U are aClient Support Plan

This document outlines the CallTower Client Services Support (CSS) Plan, specifying how to contact CSS, the case management process, and the Service Level Agreements (SLAs) used to provide the highest quality support for all CallTower services.

CallTower, Inc.
9/8/2009

Abstract

This document represents the CallTower *Client Services Support* (CSS) Plan, outlining how to contact CSS and conveying information on the CSS case management process and service level agreements (SLAs). Our goal is to provide the highest quality support for all CallTower services.

Overview

CallTower CSS provides support for all CallTower services.

This document provides information on the following:

1. **Phone Support options**
2. **Reporting and coordination of service needs and/or issues via client main points of contact (MPOCs)**
3. **Self Administration**
4. **Issue priorities**
5. **Formal response times to issues (i.e., SLAs)**
6. **Maintenance Windows**
7. **Billing Information**
8. **Reporting Information**
9. **Escalation procedures and contacts**

Note - To provide optimal support and necessary authorization for service requests, all client issues will be reported through client designated main points of contact (MPOCs). Issue resolution will be coordinated between MPOCs and end-users as appropriate.

CallTower *Client Services Support (CSS)* Information

Basic contact and escalation information for CallTower CSS

-   Email: support@calltower.com

-   Phone support: (866) 586-4700, Monday – Friday 5AM – 6PM Pacific Time

-   Emergency On-Call after normal business hours

    -   On-Call Technician – Leave a message in the support voicemail box and press 3 and then 3 again, marking the message urgent which will then page our on-call agent. The on-call technician will return the call within one hour. Should the on-call representative need client-specific expertise, they will escalate to the client TAM Team associated with that client. **Please reserve on-call requests for urgent issues.**

Phone Support

New menu options will assist you in reaching the appropriate party quickly and efficiently.

- **Option 1** – Client Support Services - Assistance for any issue that is non-technical in nature
  - User adds, moves, or deletions
  - Changes or additions to services
  - Training support, or help with any other service
- **Option 2 –** Technical Service Engineering Group – Assistance with any issue that is technical in nature.
  - Service Interruptions
  - Site or Circuit Connectivity Issues
  - Any issue that is believed to be of a technical nature
- **Option 3 –** Billing Voicemail Queue
  - Billing questions or support

Main Points of Contact

The client will designate main points of contact (MPOCs) who are authorized to initiate support tickets with CallTower CSS. All end user issues or service requests will be reported first to the client MPOCs, who will then submit support tickets with CSS after basic first level vetting/filtering as appropriate. Clients are to provide CallTower with a list of MPOCs by name, title, and current contact information.

CallTower does not use or disclose customer proprietary network information (CPNI) internally or externally without prior consent, except as required by compliance laws governing telecommunications. (47 US Code § 222 or 47 CFR § 64.2005) The MPOC's will be required to authenticate their identity with CSS using a client designated pass code before any customer information can be exchanged. (CFR § 64.2010)

Please do not enter the pass code on emailed Support requests since known email addresses for MPOCs suffice for MPOC authentication (and to avoid inadvertent sharing of pass codes with unauthorized individuals who may be copied on support-related emails). A pass code may be any alphanumeric string (e.g., a word, short phrase, or number). If there are multiple MPOCs, please designate which is primary and which is/are secondary.

The client will also provide CallTower CSS with their internal 'escalation list' containing escalation points of contact within the client organization for CallTower to use in the event it requires higher level support/interaction pertaining to a support issue.

Reasons that all issues should be reported through client designated MPOCs:

- Ensures that support ticket requests have the proper authority to be acted on.
- Provides the client with necessary insight into end-user issues and service usage.

- Builds increasing internal knowledge for the client on the CallTower solution for all types of support tickets which promotes greater self-sufficiency and increased communication effectiveness with CallTower.

- Facilitates a consistent internal issue reporting process and set of contacts for end-users, reducing confusion and frustration associated with reporting issues.

- Provides an appropriate vetting/filtering mechanism for CallTower CSS to help ensure that the client's designated CallTower support team is able to focus on and provide the quickest turn-around on real service issues (vs. perceived issues, basic training issues, client-internal networking issues, or non-issues).

Self Administration

CallTower continues to encourage the use of self administration (i.e., self-provisioning) by company administrators and MPOCs. We are able to assist you at any time with self-administration your company using the Client Provisioning system.

There are many tasks that can be taken care of quickly and efficiently by clients on their own without having to contact or wait on CallTower CSS – a few of which include:

- Password resets

- User creation and deletion

- Updating of user information

- Phone creation and deletion

Ticket Priority Definition

Priority Level	Definition	Example	Case Handling
Priority 1	Severe business impact due to heavy or total impairment of voice and/or data solution	All phones are not registered	A live handoff to a technical support representative for immediate assistance. P1's receive immediate and continuous attention.
Priority 2	Serious business impact due to partial impairment of voice or data solution	An outbound dialing problem that is business affecting	A live handoff to technical support representative for immediate work on the issue.
Priority 3	All non-emergency issues that are not AMC's.	Pickup/hunt group is not functioning correctly	Case will be assigned to next available technical support representative and Client will be contacted within 1 hour of Case Creation.
Priority 4	AMC's (Add, Move, and/or Change) Training, and Request for Information	Addition of a new user. Requests for information.	Case will be assigned to technical support representative and will be resolved within 2 business days.

Ticket Management Policy

CSS will use the following guidelines for providing updates unless an alternate agreement is requested by the client. An official RFO will be provided for any service interruption upon client request.

- **Priority 3** – Updates will be provided daily

- **Priority 2** – Update will be provided hourly

- **Priority 1** – Thirty minute updates by email or phone

Ticket Status Definitions

- **In-Progress** – an agent is actively working on the ticket.

- **On Hold** – The case is still open but is on hold.

- **Waiting for Details** – the agent requires more information from the client in order to progress the case.

- **Researching** – the agent is researching the issue.

- **Resolved** – the agent has completed all of the work for the ticket and has tested the implementation. The agent will always seek client permission to close a case. Aging cases with no response from the customer will be closed.

Maintenance Windows

CallTower's technical personnel perform routine maintenance on CallTower backend systems to ensure the highest level of performance and reliability. The CallTower Client Support Plan defines two types of system maintenance: Monthly Scheduled Maintenance and Unscheduled Maintenance. Each maintenance type is defined as follows:

Monthly Scheduled Maintenance

CallTower performs proactive, routine maintenance each month to ensure the highest level of uptime and performance for CallTower clients. Tasks performed during monthly scheduled maintenance include, but are not limited to, system patching, hardware commissioning and decommissioning, and hardware and software upgrades.

Clients will be notified via e-mail of all monthly scheduled maintenance with at least two weeks advance notice. Notifications will include the following details regarding the monthly scheduled maintenance: date/time details, CallTower products affected by the maintenance event, a brief description of the work to be performed and a brief justification for the work to be performed.

Scheduled monthly maintenance events may be followed by a more detailed notification of added features and functionality provided to CallTower clients as a result of the work performed during the maintenance event.

Unscheduled Maintenance

CallTower performs unscheduled maintenance on an as needed basis. Unscheduled maintenance is maintenance deemed too critical in nature to wait for the monthly scheduled maintenance cycle. Tasks performed during unscheduled maintenance include, but is not limited to, applying patches to fix critical functional and security bugs and necessary hardware replacement.

CallTower will always make every effort to perform the needed unscheduled maintenance outside of the hours of 4:00 a.m. to 10:00 p.m. Pacific Time. However, CallTower reserves the right to perform unscheduled maintenance at any time depending on the nature and urgency of the tasks to be performed.

Clients will be notified via e-mail regarding unscheduled maintenance as soon as possible with as much advance notice as possible. In some cases, notification prior to work being performed may not be possible. Notifications will include the following details regarding the unscheduled maintenance: date/time details, CallTower products affected by the maintenance event, a brief description of the work to be performed and a brief justification for the work to be performed.

CallTower Billing

CallTower's online **e-bill** system provides clients with full-time web access to their last six months of billing statements and full billing detail. Clients are able to access their latest invoice via the web on the afternoon of the 27th of every month by logging in to the MyCallTower Portal , navigating to the Administration tab, and clicking on the e-bill button. Alternatively, e-bill can be accessed directly at https://www.myebill.com/index.asp?startnwc. For login credentials or questions related to accessing

or using e-bill, please contact the CallTower Billing Department at billing@calltower.com or (866)586-4700.

In addition to e-bill, an email with a PDF of the invoice will be sent directly to a designated financial point of contact and/or the main point of contact on the 27th of each month.

Call Detail Reporting

CallTower Clients have access to call detail reporting via the CallTower Provisioning System (CPS). Administrators can access up to three months of information that can be downloaded and stored.

The report will list all calls that came in during the dates you specify, what time each call came in, the number of the person calling, the number the person called, and the duration of the call (in seconds). The system only keeps these reports for 90 days.

CPS administrators at your company may pull this report by following these instructions:

1. Go to www.CallTower.com.
2. Login to MyCallTower Portal via the link near the top right hand corner of the page.
3. On the left hand side of the page, select the "Administration" Tab.
4. Under the User Portal there are several button/options displayed on the upper portion of the page. Select the third option from the left called "Reporting."
5. The Reporting tool will automatically default to the "Call Detail" report.
6. Select your start and end date.
7. You may enter a specific number in either the *Calling* or *Called Number* fields (NOTE: The *Calling Number* is the number of the individual who placed the call). You may leave these blank if you would like to search all calls.
8. Select an option from the CRD Type (call record detail type) drop down. If you would like to search all call types, leave blank.
9. Select your preferred Report Format and click "Save Changes."

Please note the following:

- Reports do not become available until the following day (i.e., today's reports will be available starting tomorrow).

- As stated above, the system only saves reports for 90 days. If you need a historical report that goes back beyond 90 days, you may submit a request for it through support@calltower.com. We have the ability to retrieve call detail history for as far as back as two years. This is a special service offering and as such will be billed at a professional services rate of $100/hour. CallTower does not offer any specialized reporting above and beyond what is offered in the default report.

Client Services Escalation List

1st Level

CallTower Support	Phone: (866) 586-4700
	Email: support@calltower.com
	Phone: (415) 869-8999
	Alt. Phone: (415) 230-5160

2nd Level

Technical Account Manager – David Wilcox	Office: (405) 213-0963
	Email: dwilcox@calltower.com
	Cell: (405) 627-6692
Technical Account Manager – Mandi Derbis	Office: (801) 326-4477
	Email: mderbis@calltower.com
	Cell: (801) 309-7044

3rd Level

Manager, Technical Services Engineering – Paul Smith	Office: (801) 305-4434
	Email: psmith@calltower.com
	Cell: (801) 835-3155
Director, Client Services Support – Jeff Graham	Office: (405) 213-0931
	Email: jgraham@calltower.com
	Cell: (405) 204-5725

4th Level

Director, Client Services Delivery – Sean Lowry	Office: (801) 938-1380
	Email: slowry@calltower.com
	Cell: (801) 502-6526
VP, Engineering – James Barroso	Office: (415) 869-8998
	Email: jbarroso@calltower.com
	Cell: (801) 209-1529

5th Level

VP/CTO – Kelli Law	Office: (415) 869-8934
	Email: klaw@calltower.com
	Cell: (801) 674-6867

Other Contacts

Client Advocacy

Client Advocate – Shirley Thorne

Phone: (650) 520-2807
Email: sthorne@calltower.com
Cell: (408) 482-7669

Financial – Senior Accountant - Stacy Norvelle

Phone: (415) 869-8952
Email: snorvelle@calltower.com

Financial – CFO - Brett England

Phone: (415) 869-8922
Email: bengland@calltower.com

VP Sales and Marketing– Bob Barnes

Phone: (650) 520-2801
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Cell: (650) 906-5907

Telco Provisioning

Manager – Colleen Burns

Office: (801) 783-2201
Email: cburns@calltower.com
Cell: (801) 835-2234